

**SILLS CUMMIS & GROSS P.C.**

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**Hearing Date: February 4, 2010**

**Hearing Time: 10:00 a.m.**

*Attorneys for Defendants  
Emily Chasalow, Mark Chais, Wrenn Chais,  
William Chais, Miri Chais and the Entities  
Identified on Exhibit 1 hereto*

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

In re:	SIPA LIQUIDATION
BERNARD L. MADOFF INVESTMENT SECURITIES LLC,	No. 08-01789(BRL)
Debtor.	
IRVING H. PICARD, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC,	Adv. Pro. No. 09-1172 (BRL)
Plaintiff,	<b>WITHDRAWAL OF DEFENDANTS' LIMITED OBJECTIONS TO THE TRUSTEE'S MOTION FOR ENTRY OF A PROTECTIVE ORDER</b>
v.	
STANLEY CHAIS, <i>et al.</i> ,	
Defendants.	

**WITHDRAWAL OF DEFENDANTS' LIMITED OBJECTIONS TO THE TRUSTEE'S  
MOTION FOR ENTRY OF A PROTECTIVE ORDER**

Defendants Emily Chasalow, Mark Chais, Wrenn Chais, William Chais, and the Entities  
Identified on Exhibit 1 hereto (collectively, "Defendants")<sup>1</sup> hereby withdraw their Limited  
Objections to the Trustee's Motion for Entry of a Protective Order dated December 18, 2009.

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<sup>1</sup> The withdrawal of the Limited Objection does not constitute an appearance for defendant Miri Chais. Miri Chais expressly does not consent to jurisdiction in the United States and is not waiving her position that this Court does not have jurisdiction over her.

Respectfully submitted,

SILLS CUMMIS & GROSS P.C.

Dated: February 2, 2010

/s/ Andrew H. Sherman

Andrew H. Sherman

Philip R. White

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*Attorneys for Defendants*

*Emily Chasalow, Mark Chais, Wrenn Chais,*

*William Chais, Miri Chais and the Entities*

*identified On Exhibit 1 hereto*

## **EXHIBIT 1**

Unicycle Trading Company  
Unicycle Corporation  
Emily Chais Trust No. 2  
Emily Chais Trust No. 3  
Emily Chais 1983 Trust  
Emily Chais Issue Trust No. 1  
Emily Chais Issue Trust No. II  
Benjamin Paul Chasalow Transferee Trust No.1  
Benjamin Paul Chasalow 1999 Trust  
Rachel Allison Chasalow Transferee Trust No. 1  
Rachel Allison Chasalow 1999 Trust  
Justin Robert Chasalow Transferee Trust No. 1  
Justin Robert Chasalow 1999 Trust  
Onondaga, Inc. Pension Plan  
William Frederick Chais Trust No. 2  
William Frederick Chais Trust No. 3  
William Frederick Chais 1983 Trust  
William Frederick Chais Issue Trust No. I  
William Frederick Chais Issue Trust No. II  
Madeline Chais Transferee Trust No.I  
Madeline Celia Chais 1992 Trust  
Chloe Frances Chais Transferee Trust No. I  
Chloe Frances Chais 1994 Trust  
Jonathan Chais Transferee Trust No. I  
Jonathan Wolf Chais 1996 Trust  
Mark Hugh Chais Trust No. 2  
Mark Hugh Chais Trust No. 3  
Mark Hugh Chais 1983 Trust  
Mark Hugh Chais Issue Trust No. I  
Mark Hugh Chais Issue Trust No. II  
Tali Chais Transferee Trust No. I  
Tali Chais 1997 Trust  
Ari Chais Transferee Trust No. I  
Ari Chais 1999 Trust  
1994 Trust for the Children of Stanley and Pamela Chais  
1996 Trust for the Children of Stanley and Pamela Chais  
William & Wrenn Chais 1994 Family Trust  
1999 Trust for the Grandchildren of Stanley and Pamela Chais  
Chais Investments, Ltd.  
Onondaga, Inc.  
Chais Management, Ltd.,  
Chais Management, Inc.  
Chais Venture Holdings